UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 16, 2015

Dr. Ray McAllister
CropLife America
1156 15th Street NW
Suite 400
Washington, DC 20005

Re: Freedom of Information Request
EPA-HQ-2015-008478/Initial Response

Dear Dr. McAllister:

Thank you for your inquiry to Environmental Protection Agency's Office of Pesticide Programs' Freedom of Information Office on June 29, 2015, requesting all reasonably segregable, nonexempt portions of documents, records and materials that the Agency has relating to adverse incident reports relating to honey bees/other pollinators and pesticide products from 1995 through the present. This includes, but is not limited to, documents, records and materials contained in and relating to the Agency's Incident Data System (IDS), Ecological Incident Information System (EIIS), and FIFRA 6(a)(2) records.

For a copy of the spreadsheet of all pesticide incidents involving bees, go to the "View Records" link in the email in which you received this letter or you may go to http://www2.epa.gov/foia. Select "Access FOIAOnline" and search by request number in the search bar. This is the spreadsheet that Michael Goodis, Associate Director, Pesticide Re-evaluation Division recently discussed with you as being responsive to your request.

If you require any individual incident listed in the spread sheet, please provide to me the incident ID number. We will have to review any selected incident for any applicable exemptions under the Freedom of Information Act prior to release.

As Mr. Goodis described to you, the information in the EIIS data base is the best source in responding to your request. In response, you informed Mr. Goodis that IDS and 6(a)(2) information is no longer being requested. Furthermore, below is the requested descriptions of the IDS and 6(a)(2) sources which Mr. Goodis also discussed with you.

Incidents of bee mortality are captured in EPA's Ecological Incident Information System (EIIS) as well as the Incident Data System (IDS), although EIIS contains more detailed incident reporting information as compared to IDS. While IDS includes a subset of the information contained in EIIS, it is typically used for tracking purposes only.

In addition, under FIFRA 6(a)(2), registrants are required to submit bee kill incidents as aggregate reports [specifically, as 'Other Non-Target' (ONT) aggregate incidents]. EPA receives very limited information on the aggregate incidents, and it is not possible to determine, based on the information in the aggregate reports, whether the ONT incidents involve bees or some other invertebrate. Therefore, the extent to which the "ONT" incidents involve bees or some other animal (e.g., crayfish) is uncertain. Information on the aggregate incidents is housed in IDS. Registrants sometimes provide detailed information on individual bee kill incidents, although they are not currently required do so under FIFRA 6(a)(2). If information is provided on an individual bee kill incident by a registrant, the information is stored in the EIIS. The EIIS also contains information on individual bee kill incidents reported voluntarily by non-registrants.

For the purposes of this FOIA request, EPA is confident that EIIS provides a complete set of submitted bee mortality incident reporting data. Also, note that the EIIS data table includes records of all incident pesticide combinations. If a bee kill incident was associated with more than one pesticide, it will appear in the data table more than once.

If you have any questions or need additional information, please contact me on (703-308-8044) (9:30 a.m. to 7:00 p.m.) or email me at mullins.gary@epa.gov. Refer to your FOI Number when contacting the office about this request.
Sincerely,

Gary Mullins

Office of Pesticide Programs
Public Information and Records Integrity Branch
Information Technology and Resources Management Division
Office of Chemical Safety & Pollution Prevention (OCSPP)
U.S. Environmental Protection Agency (USEPA)